

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 746-764 and 776-794)	
MHz Bands, and Revisions to Part 27 of the)	WT Docket No. 99-168
Commission's Rules.)	

To: The Commission

**COMMENTS OF
THE INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE
ON ISSUES RELATED TO GUARD BANDS IN THE
746-764 AND 776-794 MHz SPECTRUM BLOCK**

The International Association of Chiefs of Police (IACP) hereby submits the following comments in response to the Commission's *Public Notice*, DA 00-31, released January 7, 2000, in the above captioned proceeding.

The IACP is pleased that the Commission has recognized the needs of public safety in this proceeding and we strongly support the action of the Commission in the creation of guard bands to protect public safety spectrum.

RESPONSE TO THE ISSUES ON WHICH COMMENT IS SOUGHT

Recent complaints by IACP members relative to interference caused from cellular type systems to their police radio systems in the 800 MHz bands causes us to strongly oppose the use of cellular and cellular-type architecture in the guard bands. We therefore urge the Commission

to restrict operation in the guard bands to those entities that would not use an architecture that employs an intense cellular-like frequency re-use pattern.

We again urge the Commission to only permit compatible land mobile systems in the guard bands.

We believe that there must be strong frequency coordination rules to protect the interests of public safety in the guard bands.

We urge the Commission to adopt rules that will protect the interests of public safety in an all inclusive way and to appropriately notify those that choose to use the guard bands that they will be at risk of license termination should they cause unanticipated interference to public safety systems on the adjacent channels. In a world of rapidly changing technology, we believe the Commission should take unprecedented action to adequately protect the public safety systems that serve the critical public safety interests of our citizens.

CONCLUSION

The IACP urges the Commission to adopt stringent technical interference rules, system architecture restrictions, and frequency coordination rules for guard band licensees, as discussed above and elsewhere in the record of this proceeding.

Respectfully submitted,

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By: Colonel Michael D. Robinson, President
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Dated: January 18, 2000